IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA

IN RE:	)	
	)	Chapter 13
Michael Donnell Terry and	)	
Lola Yvonne Johnson Terry	)	
Debtor(s),	)	Case No. 00-06427 B
	)	
	)	

MOTION TO SELL PROPERTY

Debtor(s), by their counsel, hereby moves before this Court for an Order allowing Debtor(s) to sell their property located at 1308 Lorick Road, Blythewood, Columbia, South Carolina. In support of such, Debtor(s) would show this Court the following:

1.   Debtor(s) filed a Petition for Relief under Chapter 13 of the Bankruptcy Code on or about July 25, 2000.

2.   Debtor(s) are the owners of property located at 1308 Lorick Road, Blythewood, South Carolina which will be sold pursuant to the terms of the executed contract of sale for a purchase price of $40,000.00;

3.   Home Equity is the holder of a secured claim against the Debtor(s), as evidenced by a mortgage on the above-described property.

4.   Debtor(s) wish to sell the property and pay off the mortgage. Debtor(s) are to clear $17,000.00 which will pay off the mortgage and the Chapter 13 Plan.

5.   Debtor(s) are informed and believe that the purchase price is sufficient to pay off the mortgage and pay off Chapter 13 Plan. Debtor(s) attorney shall receive $695.00 as reimbursement for outstanding fees and cost associated with this action at closing; and

6.   Debtor(s) believe that it is in the best interests of the creditors and the

Debtor(s) for the land to be sold, as the sales price will be sufficient to pay of the balance of the plan.

WHEREFORE, Debtor(s) move before this Court for an Order allowing Debtor(s) to sell the above-described land and allocate the proceeds as described hereinabove.

Respectfully submitted.

MOSS & REED, P.A.

By: _____
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